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STUDY OF SKILLS PROFILES AND TRAINING NEEDS IN THE FIELD OF CUSTOMS ADMINISTRATION IN BOTSWANA, LESOTHO AND ZAMBIA

I. SUMMARY

Background

1. Article 3 of the Protocol annexed to the Preferential Trade Area for Eastern and Southern African States (PTA) relating to customs co-operation, binds member States to (a) encourageco-operation between their respective national customs administration and the Committee (on Customs and Trade); and (b) establish joint training facilities and arrangements on programmes for the training of personnel engaged is customs administration. 1/ To co-ordinate and monitor the implementation of the above mandate, Article 8 of the same protocol calls on the customs and trade committee, established by Article 11 of the PTA Treaty, to, among other things, undertake studies and "make recommendations on practical aspects of customs co-operation among member States, including those relating to joint training for personnel engaged in customs administration". 2/

2. Such studies are expected to result in the formulation and implementation of policies, strategies and programmes that would ensure the effective administration and operation of the provisions as contained within the PTA Treaty and Protocol. To initiate action on the studies, a project document on training in customs administration was designed, proposed to and adopted by the Lusaka-based MULPOC Council of Ministers during its Sixth meeting in February 1983.

3. The long-term objective of the project is to develop and operate relevant training programmes within the Eastern and Southern African sub-region in the field of customs administration and management with specific reference to matters concerning the preferential treatment of imports and exports, the simplication and harmonization of customs regulations and procedures and the prevention, investigation as well as repression of customs offenses. 3/ The project is divided into three implementation phases with the present study being the first of the three. The second phase constitutes the specification and design of the content, duration and modalities of regional and national training programmes including workshops and seminars while the final phase is the mobilization and utilization of resources for the actual execution of the programmes.

Objective and organization of the study

4. As indicated above, the customs administration skills profile and training needs study is the first phase of a three phase project. The study aims at developing an inventory of customs personnel training facilities and programmes within the sub-region. It also aims at assessing existing customs staff training needs and future manpower requirements. Consequently, the specific objectives of this study were to (i) identify customs personnel and appraise their training

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1/ Treaty for the Establishment of the PTA for Eastern and Southern African States, UNECA, Annex II, Article 7, p. 56.

2/ Ibid., p. 56.

3/ ECA/MULPOC/LUSAKA/VII/7(iv), February 1984, Addis Ababa, p. 1.

needs; (ii) identify customs training facilities and programmes and determine their capacities and level of efficiency; and (iii) highlight issues and make recommendations that would guide in the determination of regional and national training programmes in customs administration.

5. So far, the ECA has organized two missions in respect of the customs administration skills profils and training needs study. The first, organised in 1983, covered Kenya, Uganda, and Zimbabwe. Synthesis of the report of this mission is annexed to this report. The second mission, taking between 5 September through 4 October 1984, covered Botswana, Lesotho and Zambia. Efforts were made prior to the undertaken of the second mission to include Malawi, Tanzania and Swaziland, but these efforts were not realized.

Scope, methodology and limitation

6. The study was limited to activities of the Department of Customs and Excise in the three countries visited. These activities related to Departmental administrative arrangements, responsibilities, operations, training programmes and facilities, establishment post development and inter-relationship with other national and international bodies.

7. Prior to undertaking the field work, discussions were held with officials of the Lusaka-based MULPOC and the PTA Secretariat. On the field, relevant documents were sellected and analysed. As a complement, interviews and consultations with officials from national customs departments, customs training institutions, ministries responsible for manpower planning and trade, the PTA Secretariat, UNDP, the Lusaka-based MULPOC and the ECA secretariat, were held.

8. The study was constrained by two limitations. One, which is specific to Zambia, was the team's inability to meet with the Controller of Customs who is head of the Department and, therefore, resides in Livingstone at headquarters. Though discussions with the controller were held by telephones, very little useful information was obtained from him. Much of what was obtained resulted from the excellent co-operative efforts of the Assistant Controller who resides in Lusaka. The second limitation was due to either the lack of or the unwillingness to release to the team detailed information concerning the qualifications of individuals who occupy establishment posts within the various Departments. The only objective indicator to determine skill levels of staff was, therefore, limited to the types, content and number of training programmes undertaken by staff while in service. Perhaps a more feasible approach which could have minimised these limitations would have been the use of a questionnaire particularly for deriving the inventory and skill levels of customs personnel.

Findings- main conclusions and recommendations

Findings

(a) Customs administration and operation:

9. Customs administration in Botswana, Lesotho and Zambia is the direct responsibility of Departments of Customs and Excise under the supervision of the

Ministers responsible for finance in the three countries. A Controller of Customs and Excise heads the Department in Zambia while the Departments in Botswana and Lesotho are headed by a Director of Customs and Excise. Besides servicing as a revenue collecting arm of Government, the general operations of the departments are border inspection and record keeping on the type and flow of goods in and out of the country within the limits of national import and export regulations. As party to the Customs Union Agreement between themselves and the Republic of South Africa, the Departments of Customs and Excise in Botswanaand Lesotho assess and collect customs excise and sales duties internally on behalf of the Customs Union Common Revenue Pool which is then redistributed amongst members in accordance with a laid down formula.

10. Institutional arrangements and coverage of departmental services are well specified is Botswana, Lesotho and Zambia. A number of border posts or parts of entry have been established and more are being comtemplated. Additionally, each department has supportive units for training, data collection and accounting purposes. The task now is to have the institutions strengthened in terms of facilities and staffing.

(b) Staffing

11. Progress has been made in the three countries with regard staff development. High-level customs administrators in Botswana, Lesotho and Zambia have had considerable training and practical experience in customs matters. Middle-level officers have had ample exposure to customs procedures and practices.

12. Establishment posts increased between 1974 and 1984 in Botswana, Lesotho and Zambia by 67 per cent, 34 per cent and 52 per cent respectively. Despite this increase, the recruitment of suitable personnel at the middle-level grade has been a general problem. Added to this is the difficulty encountered in retaining the few personnel who do not only have the required qualification, but who have undergone in-service training in customs precedures and administration. The combined impact results in (i) a vacancy rate somewhere between 12 to 20 per cent at any point in time; (ii) non-optimum performance of expected duties; and (iii) an ineffective staff development programme in terms of training costs.

13. The narrow scopefor career development through promotion couple with higher pay packages in private and parastatal enterprises have contributed to the magnitude of the problem. What this suggest is that the development of institutional and staffing capabilities for the delivery of customs services would require a comprehensive manpower management policy within the framework of national staff development and staff utilization policy. This would include productivity planning, career planning, occupational development measures and wage planning.

(c) Customs training institutions and programmes

14. A Customs Training Centre was established by the end of 1974 in Botswana. The initial programme of the Centre includes a 3-weeks induction course; two 6-weeks promotion training courses leading to a series of qualifying examinations for Assistant Customs Officers, Customs Administrators and Senior Customs Officers; and ad-hoc refresher courses as and when the need arises. Though understaffed and ill-equiped, the Centre played a leading role in the EEC sponsored regional customs

training programme for Botswana, Lesotho and Swaziland (BLS), The programme has come to a stand still for the past three years due to the lack of a qualified trainer even though funds are available. The Centre activities have been erractic over the years due to the rapid turn-over of trainers. The present training officer lacks formal training as a trainer, and efforts are being made to recruit a qualified training officer, Similar efforts ought to be made to strengthen the Centre which could become the focal point for advanced customs training for the BLS countries.

15. Though the Department of Customs and Excise in Lesotho does not operate a training institute, the Department houses a Training Unit which has organized a number of training programmes over the years. Much of the Unit's work is done in collaboration with the National University of Lesotho, the Lesotho Institute of Public Administration and other customs training institutions outside of Lesotho. Appropriate recommandation to Government has been made for the establishment of a customs training school with a capacity to offer a basic training course and an intermediate course for 20 trainees in each course. Such a proposal would however need to be considered in terms of its costs-effectiveness in relation to current practices particularly at a time when the need for regional co-operation in training is becoming more and more a priority issue.

16. The Customs Centre Training School (CCTS) of Zambia operates under the tutorship of 3 qualified trainers, a 3-weeks orientations in-service sourse over a 6 month period, a basic 3-months intermediate course and an advanced course in accordance to needs and the availability of time and resources. The school has the capacity to accommodate 20 boarders with 2 to a room. One of the two classrooms is under-utilized because of the school's incapacity to board more than 20 trainees. There is great concern over the poor performance of graduates once they have left the school. A need exists to strengthen the teaching capacity of the school by adding a senior trainer to be responsible for conducting advanced courses in customs administration and management.

17. Senior and middle-level customs officials in Botswana, Lesotho and Zambia have undergone training in a number of countries outside their own since 1972. The content of both national and international training programmes includes generally customs procedures, regulations, excise determination and administration, protection and import/export clearances and control. These fields will have to be expanded in scope to take into account the demands of the PTA Treaty and Protocol.

Conclusion and recommendation

Conclusion

(a) Implications for manpower development

18. Basically, the PTA aims to "promote co-ordination and development in all fields of economic activity, particularly in the fields of trade, customs, industry, transport, communication, agriculture, natural resources and monetary affairs...". (Article 3 para 1 of PTA Treaty), These aspirations raise a number of issues for customs administration and management within the Southern and Eastern African subregion. Mobility of goods across borders will intensify. Other issues such as the time lag within which goods are cleared for consumption, harmonization and standadization of procedures rates and quality of goods would become major pre-occupations

for customs administrators. The magnitude of these issues would be affected by the co-existence and possible overlapping of the southern African Customs Union, the PTA and the south Africa Development Co-operation Council (SADCC).

19. For Botswana, Lesotho and Zambia to derive a meaningful package of benefits from these arrangements, their approach to customs administration would need to go beyond border protection and duty collection into the development of staffing capabilities that would:

(i) review and harmonize tariffs, procedures and regulations;

(ii) prepare, dessiminate and explain tariff structure, regulations and procedural guidelines to importers, exporters and customs officers;

(iii) performe the day-to-day operations of certification, clearances, record keeping and reporting.

20. The implications are two-fold: one, additional establishment posts will have to be created within each country to allow for the recruitment of international trade economists and statisticians. Two, career prospects and competitive reward systems will have to be developed and ensured so as to attract and retain adequate high and middle-level officers.

(b) Training needs, strategy and programming

21. Respective Department of customs and excise in Botswana, Lesotho and Zambia has embarked upon a number of national and international training programmes to meet their basis, intermediate and advanced training needs. While meeting these three levels of training needs remain urgent, their specific dimension must be worked out within the context of existing regional intergovernmental organizations. Certainly, any training strategy should evolve around the PTA' objective of promoting common training programmes and institutions. Consequently, a detailed regional plan of action ought to be developed particularly for undertaking intermediate and advanced training. The programming of such an action could result from a regional training development workshop involving Heads of Customs Department and their Training Officers to be jointly organized by the PTA, International Trade Centre (ITC), EEC, CCC and MULPOC. Findings of the skills profile study could provide background documentation for the workshop.

Recommendation

22. The Council of Ministers may wish to consider the following recommendations for action:

(i) the customs administration skills profile and training needs study should be completed as early as possible;

(ii) The PTA secretariat should organise, in collaboration with the Lusaka-based MULPOC, CCL, ITC and the EEC, a Regional Training Development Workshop involving Heads of Customs Departments and their Training Officers to:

- review the PTA protocols and treaty in relation to the requirements for customs officials;

- consider the findings of the skills profils study and country papers on staffing capabilities, training needs and capacities;

- formulate training policies, programmes, schedules and content.

(iii) on the basis of the workshop report, a project document should be prepared for the mobilization of resources for the execution of the training programmes.

II. REPORT OF THE FINDINGS

A. Introduction

23. The urge to develop institutions for the promotion of economic co-operation and integration in Southern and Eastern Africa is becoming increasingly pressing. The setting up of the Preferential Trade Area (PTA) in that sub-region is an attempt to crystalize this urge. Among existing national institutions that would undergo tremendous staff development and precedual restructuring to respond appropriately to this urge is the Department of Customs and Excise.

24. This fact was recongnized by the Council of Minister for the Lusaka-based MULPOC, and has consequently called for the development of training programmes in the field of customs administration and management with specific references to matters concerning the PTA treatment of imports and exports, the simplification and harmonization of customs regulations and customs offences. To answer this call, and as a first step, the ECA mounted two missions with a view of determining existing manpower capabilities in customs departments and assessing their training facilities and programmes. The first mission, a brief report of which is annexed to this report, covered Kenya, Zimbabwe and Uganda. The second mission, undertaken in the latter part of 1984, covered Botswana, Lesotho and Zambia. Efforts should be made to finalize the study particularly to include those non-english speaking member States of the sub-region.

25. What follows in the rest of the report are the respective findings of the mission to Botswana, Lesotho and Zambia. The team in indeed greatful to all those who contributed to the derivation of these findings.

B. Country findings

Botswana

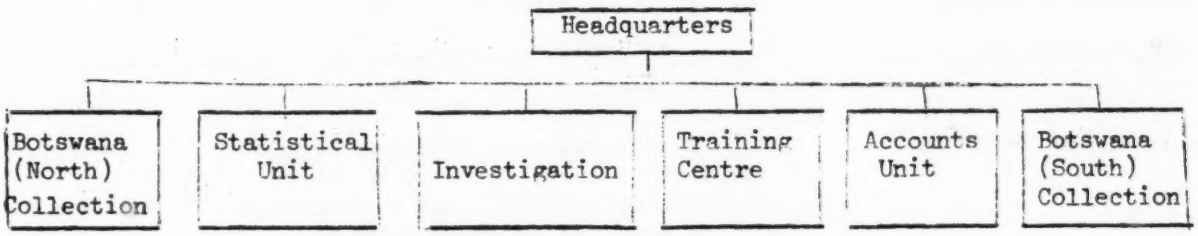
Administration and operation

26. In December 1969, the Government of Botswana, along with the Government of Lesotho, Swaziland and South Africa, signed a treaty terminating the 1910 customs agreement between themselves and concluding a new Customs Union Agreement. This development led to the creation of the Department of Customs and Excise in

March 1970 within the Ministry of Finance and Development Planning to Administer the terms of the Agreement. Specifically, the Department was, and is still charged with the responsibilities to (i) collect related statistics; (ii) control revenue and security of imports, exports as well as air, road and rail traffic; and (iii) assess and collect customs, excise and sale duties within Botswana for the benefit of the Customs Union Common Revenue Pool.

27. The Department is headed by a Director of Customs and Excise who is assisted by 1 Deputy Director and 1 Assistant Director. At the customs operational level, the country is divided into Botswana North and Botswana South collection areas with each placed under the direct control of a Collector of Customs and Excise. Discussions are underway to amend the present arrangements in terms of regrouping existing customs posts under 3 collection areas to be known as South Collection, Central Collection and North Collection respectively. The following illustrates the existing structure of the Department.

Figure 1. Structure of the Department of Customs and Excise - Botswana



Customs Posts

- Francistown Long Room
- Francistown Airport
- Kazungula Border
- Kasungula Ferry
- Ramokgwebana
- Selebi Phikwe Airport
- Selebi Phikwe Railway

- Palapye
- Maun
- Opapa
- Point Drift
- Platjan
- Sambou
- Zanzibar
- Martins Drift

Customs Posts

- Gaborone Long Room
- Gaborone Airport
- Lobatse
- Pilane
- Mahalapye
- Parre Halt
- Sikwane

- Ilokweng Gate
- Ramotswa.
- Pioneer Gate
- Ramatlabama
- Phitshane Molopo
- Bray
- Mamono
- Jwaneng

Staffing situation and pattern

28. On the initiative of the Government, and given the absence of qualified nationale, 8 British Customs officials were seconded to the newly established Department between 1971 and 1972. They were to assist in the development of national staff capabilities while at the same time assist with the implementation of the Customs Union Agreement. Though the rate of dependence on foreign manpower has declined over the years, the Department is faced with the problem of recruiting candidates

with an appreciable level of education and experience. A case in point is that recruits are generally almost entirely from the annual school-leaving community. For example, it is observed that in 1977 only one servicing national out of the entire staff had an education qualification better than Cambridge school certificate in the third class.

29. What aggravates the situation more is the divergence between the level of skills and knowledge of the majority of staff at the point of entry and those established as minimum in the Department's scheme of service as shown in the following table.

Table 1. Qualification at point of entry for middle-level customs officers in Botswana

Designation	Minimum qualification at point entry
Customs Assistant	Jr. certificate and at least sixteen years old
Sr. Customs Assistant	Cambridge School Certificate with passes in English and Mathematics
Asst. Custom Officer	Part I University of Botswana degree in accountancy, commerce or statistics; or a Botswana Institute of Administration (BIA), and commerce certificate in accountancy and business studies
Customs Officer	Commerce diploma in accountancy and Botswana Institute of administration or a University diploma in statistics or a general recognised university degree
Sr. Customs Officer	Same as customs officer with at least six years of related working experience outside the department

30. Failure on the part of the Department to locate and attract nationals with the above minimum qualifications have led to high vacancy and staff turnover rates for Sr. Customs officers, Customs officers and Assistant Customs officers over the years. In 1983, 36 customs officers, most of whom had received comprehensive pre and in-service training, along with 3 Sr. preventivemen who were due for promotion, resigned from the Department. It is estaimated that a 12-15 per cent vacancy rate exist presently. Post vacancy trends are shown in table 2 below.

Table 2. Approved establishment and filled post for selected years

Post	31/3/77			31/3/79			30/9/80			31/3/83		
	Approved	Inpost	Short	Appl.	Inp.	Sht.	App.	Inp.	Sht.	App.	Inp.	Sh
Director	1	1	-	1	1	1	1	1	-	1	1	-
Deputy Director	-	-	-	-	-	-	-	-	-	1	1	-
Assistant Director	1	1	-	1	1	-	2	2	-	1	1	-
Collector	2	2	-	2	1	1	3	2	1	3	2	1
Sr. Customs Officer	4	2	2	4	1	3	7	1	6	10	7	3
Customs Officer	11	9	2	16	15	1	12	11	1	16	7	9
Assistant Customs Officer	14	7	7	23	4	19	33	12	21	48	34	14
Sr. Customs Assistant and Customs Assistant	20	20	-	80	25 66	(11)	70	56 20	(6)	81	80	1
Preventivemen	9	9	-	19	16	3	19	19	-	31	25	6
Total	62	51	11	146	130	16	147	124	23	192	158	34

Growth of establishment and staff distribution

31. Despite the problems highlighted above, establishment posts grew over the years. Total approved establishment for customs officials reacheed 192 in 1984 from 39 in 1972. The absolute growth is presented in table 4. There seems to be a standard growth pattern. During the first five years, establishment posts increased by 100 per cent establishing in the sixth years, establishment posts increasing by 46 per cent at the end of the next 3-year period. Following another 2 or 3-year period of zero growth the establishment increased by 45 new post, an increases of nearly 25 per cent. It is projected to reach 194 in 1985.

32. Staff distribution at various ports of entry is in response to the volume of activities at the ports. The following distribution is anticipated for 1984/85 with most of its implementation being enforce presently. Each collection area is under the direct supervision of either a Senior Customs Administrator or a Senior Customs Officer.

Table 3. Staff deployment by category and ports of entry

Category/ Ports of Entry	Total	PR3/GA2	PR3/GA2	GA4	GAS/6	P6/7
South collection	60	3	4	16	28	9
Gaborone Customs House	14	2	1	3	8	-
Lobatse customs house	5	1	-	2	2	-
Gaborone Airport	6	-	1	1	2	2
Ramatlabaura	8	-	1	2	3	2
Trokweng Gate	7	-	1	1	3	2
Pioneer Gate	4	-	-	1	2	1
Bray	3	-	-	1	1	1
Bray	3	-	-	1	1	1
Phitsane Molopo	2	-	-	1	1	-
Raurotswa	2	-	-	1	1	-
Pilane	4	-	-	1	2	2
Sikwane	3	-	-	1	2	1
Mamono	2	-	-	1	1	-
Jwanang Airport						
Central Collection	39	0	4	11	15	9
Palapye Customs house	7	-	1	2	3	1
Mahalapye	4	-	1	1	2	1
Martina Drift	6	-	1	1	2	2
Selehipkwe	4	-	1	1	2	1
Selehipkwe Airport	3	-	-	1	1	1
Parr's Halt	3	-	-	1	1	1
Zanzibar	3	-	-	1	1	1
Platjan	3	-	-	1	1	1
Point Drift	3	-	-	1	1	1
Saambou	3	-	-	1	1	1

Category/ Ports of Entry	Total	PR3/GA2	PR3/GA2	GA4	GA5/6	P6/7
North Collection	47	3	4	13	18	9
Francistown	17	1	2	5	8	1
Ramokgwebaua	8	1	-	2	3	2
Kazungula Road	8	1	1	2	2	2
Maun Airport	3	-	-	1	1	1
Orapa Airport	3	-	-	1	1	1
Francistown Airport	3	-	-	1	1	1

Key: PR3/GA2: Customs Administrator/Sr. Customs Officer
PR4/GA3: Assistant Customs Administrator/Customs Officer
GA4: Assistant Customs Officer
GA5/6: Sr. Customs Assistant/Customs Assistant
P6/7: Sr./Jr. Preventivemen

33. As indicated earlier, each of the 3 collection areas is headed by either a Senior Customs Administrator or a Senior Customs Officer. The Department has 5 of such high-level customs officials with the remaining 2 serving as head of the Training Centre and the Investigation Unit respectively. The Statistical Unit is heavily maned by staff seconded from the Central Statistical Officer (CSO). In fact, all of the 4 high ranking officers inthe Unit are from the CSO. 8 officials as the middle and lower levels in the same Unit are also seconded from the CSO with 2 having the rank of Assistant Customs Officer and 6 as Customs Assistants.

34. The distribution pattern for most of the collection areas is expected to remain the same over the next five years or so. However, activities within Francistown and Gaborone are expected to increase tremendously in response to the anticipated industrial and trade expansion and the level of Botswana participation in PTA matters. This would require the stregthening of headquarters staff with particular emphasis on the Training Centre, Statistical Unit and the Investigation Unit. Identified as a major constraint is the freeze placed on the growth of establishment by Government.

Table 4. Growth of establishment post from 1972-1985

Post / Year	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	Projected 1985
Director	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Deputy Director	-	-	-	-	-	-	-	-	-	-	-	1	1	1
Assistant Director	-	-	-	1	1	1	1	-	2	2	2	1	1	1
Collector	1	1	1	2	2	2	2	2	2	3	3	3	5	5
Senior Customs Officer	2	2	2	4	4	4	4	4	4	7	7	10	8	8
Customs Officer	6	7	7	10	10	11	11	16	16	12	12	16	16	16
Assistant Customs Officer	10	24	30	15	15	14	16	35	23	33	33	48	48	69
Senior/Customs Assistant	15	15	15	30	38	38	40	68	80	70	70	81	81	81
Preventivemen	4	4	8	8	9	9	18	19	19	19	19	31	31	33
Total	39	54	64	71	80	80	93	146	147	147	147	192	192	194

Training institution and programme

35. The need to institutionalise training for customs officials was felt and articulated at the inception of the Department of Customs and Excise. By the end of 1974, the Customs Training Centre was completed and placed under the direction of a Training Officer. The objectives of the training programme are listed as (i) stimulating interest in the work of the Department; (ii) making officers competent in all aspects of their duties; and (iii) making it possible for them to enjoy a full career in the customs and excise cadre. 4/ As such, the Centre, located in the Gaborone Customs House, is primarily responsible for organizing and executing in-service training.

36. Activities of the Centre were disrupted for nearly 18 months between 1978 and August 1979 due to thedeparture of the Training Officer who was on secondment from the British Government. A replacement was found but left February 1982 at the end of his secondment, leaving the Centre again helpless in executing its activities. Though a national has assumed training responsibilities in the Centre, the incumbent lacks formal training as a trainer. Efforts to recruit a qualified trainer have yielded no results. The Centre activities are occasionally organized jointly with the Botswana Training Centre and the Botswana institute of Administration and Commerce, with the two assisting in the provision of residential facilities for out-of-town trainees as the need arises.

37. Generally, the Centre programmes seek to (i) serve as on induction exercise for newly recruits; (ii) provide the basis for determining staff promotion from one grade level to the next; and (iii) upgrade existing staffing capabilities for dealing with new developments in customs administration and management. Consequently, the Centre offers 3 sets of courses. Namely, a 3-weeks induction courses, two 6-weeks promotion training course and a periodic refresher course tailered according to needs and resource availability. On the basis of these, and following a training programme, the Department institutes two qualifying examinations whose results govern either the appointment or advancement of senior customs officers, customs administrators and assistant customs officers. The basic coverage of the examinations, the contents of which are dealt with during training, are the following:

(1) Assistant Customs Officer Qualifying Examination

(a) General provisions of the Finance and Audit Law: types and allocation of revenue, in-correct allocations and outline of Departmental Accounting;

(b) General Provisions of the Customs and Excise Duty Act and other current customs legislation; principles of revenue control; functions of the Department; general aspects of control; examination and clearance of imports and exports; entries and entry checking, transfer traffic procedures; offences; prohibitions and restrictions; seizures and detentions; agency work;

(c) General aspects of the tarrif and rebate schedules; duty liability of goods; basis duty calculations, assessment and checking;

4/ Personnel Directive No. 22 of 1983, Ref. FDPC.1/3/621, 1983, p. 13.

(d) Control of border posts, airports, warehouses and other places of revenus interest;

(e) Long-Room procedures; report writing, minute writing and letter writing; responsibilities of officers and supervision of junior officials;

(f) General aspects of Excise Duty Control.

(2) Customs Administrators/Senior Customs Officers Qualifying Examination

The training course content covers the more advanced aspects of customs administration and techniques to allow candidates to sit for the examination. Specifically the courses covers:

(a) All provisions of the Customs and Excise Duty Legislation; implications of the 1969 Customs Union Agreement; Customs implications of trade and technical assistance agreement;

(b) Tariff classification and nomenclature; valuation of goods; investigation techniques; preparation of case files arising from litigation and liaise with Attorney General's Chambers;

(c) Organization of a customs and excise office or unit; induction and on-the-job training; staff discipline, supervision and reporting; accounting and internal audit; relations with other Government departments and the general public.

38. Training of Customs Officers is also undertaken outside of Botswana. Over the years, particularly during the earlier years of the Department existence, extensive use has been made of the Mombassa Customs and Excise Training School mainly to expose trainees to the basic principles of customs and excise. Additionally, Assistant Customs Administrators, Customs Officers and other senior officials were and continue to be sent to the United Kingdom, Austria, New Zealand, Australia and Finland.

39. The Customs Training Centre played a major role in the development and operation of a regional customs training programme for Botswana, Lesotho and Swaziland (BLS) under the auspicies of the EEC. The programme is aimed at mounting and executing basic, middle management and advanced courses for customs offieers from the BLS states. Unfortunately, the programme has suffered a set back during the last two years. With the departure of the Training officer from Botswana in 1982, nothing has been done to-date by way of constituting a training programme despite the availability and idleness of the programme training funds. It is anticipated that the Government of Lesotho would provide a qualified trainer since all the concerned parties are keen on the re-vatalisation of the programme.

Lesotho

Administration and operation

40. The Department of Customs and Excise, Located within the Ministry of Finance, is headed by a Director who is assisted by a Deputy Director. The Kingdom of Lesotho

is a party to the 1969 Customs Union Agreement between Botswana, Lesotho, Swaziland and South Africa; and as such the Department serves as an administering arms of the Union at the national level.

41. The Department has, as supportive units, a Training Unit and a Statistical Unit both of which are in dare need for strengthening. Substantive services rendered are border post services in the northern, central and southern parts of the country; the monitoring of customs legislations, conventions and trade agreements; and revenue and inland services. Each of the service units is headed by a Principal Customs Officer. The structure of the Departure is illustrated in Figure 2 below.

42. Operationally, the Department is charged with the responsibilities to (i) collect, compile and publish import and export statistics in collaboration with the Bureau of Statistics within the Ministry of Planning, Employment and Economic Affairs; (ii) assess and collect customs excise and sales duties within Lesotho on behalf of the Customs Union Revenue Pool; and (iii) inspect border posts for the flow of goods. A substantial part of the Department's managerial activities has been devoted to participating in the deliberations of the southern Africa Customs Union Liaison Committees on technical matters, trade and industry and transport as well those of the Customs Co-operation Council (CCC).

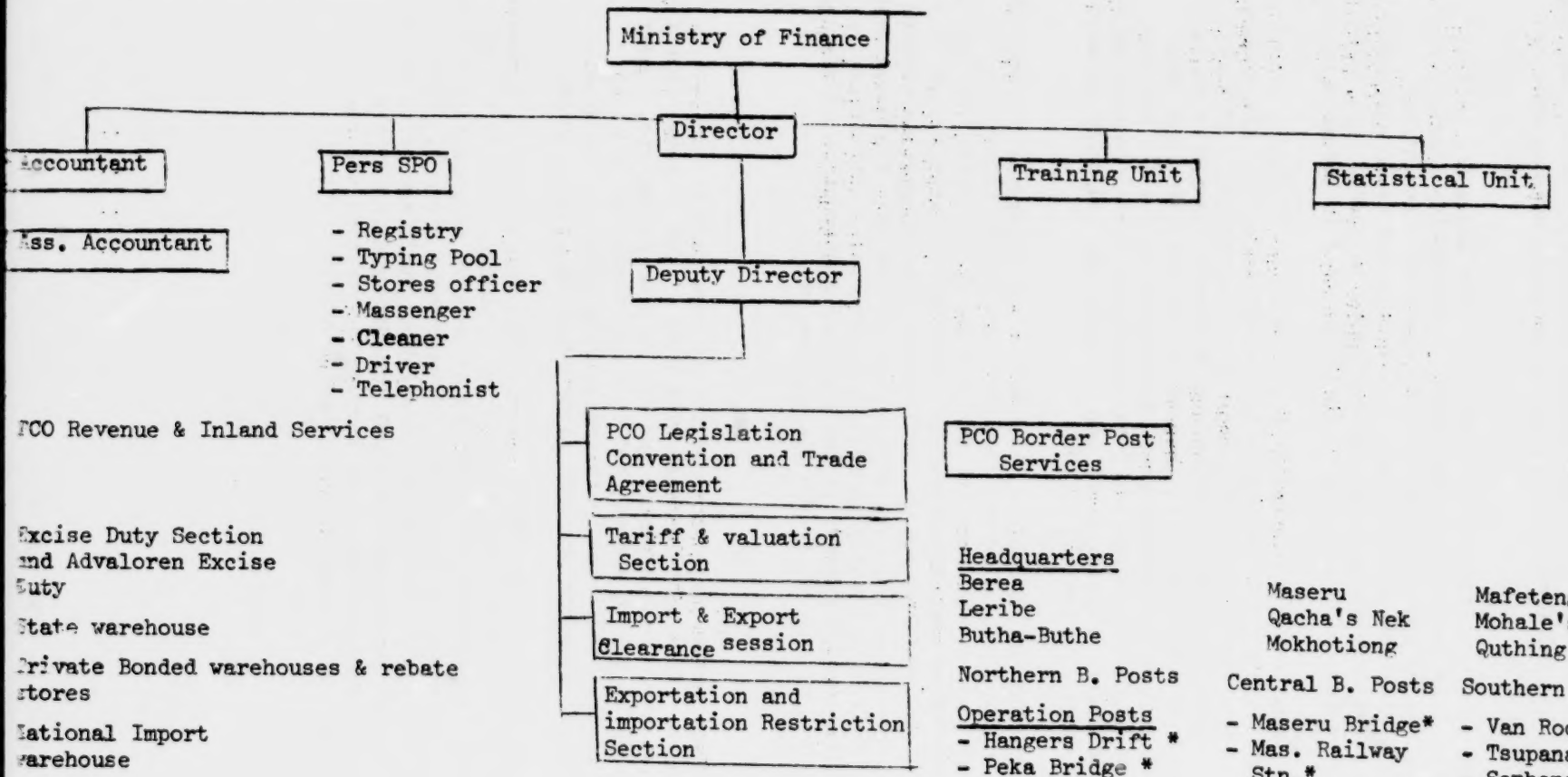
43. Activities involving customs inspection, assessment and clearance of importables and exportables have been minimum due to two factors: one, given Lesotho's geographic position, most imports destined for the Kingdom from outside the Customs Union area go through RSA where customs clearances take place. Secondly, the low base of local manufacturing industry creates little scope for generating export and excise processing activities. However, probability exists that the Department's activities may increase following planned expansion of commercial activities, the introduction of processing foreign parcels in Lesotho, the construction of planned border post and the opening of the new international airport.

Staffing situation

44. Approved establishment posts for customs officials rose from 121 in 1974 to 184 in 1984 representing a 34 per cent increase with most of the increase made for customs officers, Assistant Customs Officers and Sr. Customs Assistants. Under normal expectations, this is a mild growth, but in view of the low level of customs activities for reasons indicated in the preceeding section, the growth seems reasonable. The trend over the years is illustrated in table 5 below.

45. Concerns for further increases in establishment posts were, however, expressed with particular reference made to the need for posting a customs attache to the Customs Co-operation Council headquarters, handling of foreign parcels intended to now be processed in Lesotho and staffing the new international airport. What remains unclear in this regard, is whether or not existing staff are being under-utilised. Should they be, it may be more rational for the handling of the envisaged additional workload to be approached through re-training and re-deployment of existing staff as opposed to the creation of new posts.

Figure 2. Department of Customs and Excise Organization Chart - Lesotho



* Border Posts with new offices and staff quarters.

Table 5. Growth of Establishment for Customs officers from 1974-1984

Posts/ Fiscal Year	1974/ 1975	1975/ 1976	1976/ 1977	1977/ 1978	1978/ 1979	1979/ 1980	1980/ 1981	1981/ 1982	1982/ 1983	1983/ 1984
Director	1	1	1	1	1	1	1	1	1	1
Deputy Director	-	-	-	1	1	1	1	1	1	1
Controller	1	1	1	-	-	-	-	-	-	-
Principal Customs Officer	6	6	4	4	4	4	4	4	4	4
Customs Instructor	-	-	-	-	-	1	1	1	1	1
Senior Custom Officer	6	6	6	6	6	6	6	8	8	9
Customs Officer	8	9	16	17	17	17	17	22	22	26
Assistant Customs Officer	56	55	55	57	57	57	57	59	59	64
Senior Customs Assitant	-	-	-	-	15	15	15	18	18	25
Customs Assistant	43	44	44	44	29	29	29	31	31	553
Total	121	122	127	129	130	131	131	145	145	184

Source: Department of Customs and Excise Annual Reports, 1980, 1981 and 1982; with 1983/84 obtained from Director.

46. A major staffing problem faced by the Department is its inability to compete effectively with the pay packages of the private sector and parastatals. This situation has resulted in (i) a high and persistent staff turn-over rate particularly among those staff with university education, and (ii) difficulties in attracting competent nationale to enter the service of the Department. The net results have been a vacancy rate which fluctuates between 18 and 25 per cent at nay point in time and the under-achievement of Departmental functions. It is, however, anticipated that the salary review exercise currently underway would minimize the magnitude of the problem.

Training institution and programme

47. There is no institutionalized training institute for customs officers under the direct control of the Department other than the created Training Unit within the Department. Appropriate recommendation for the establishment of a customs training school has, however, been made. It is proposed that the school should have the capacity to operate a basic training course and an intermediate courses with each accommodating 20 trainees at a time. While the urgency and relevance of such a recommandation are attractive, the costs-effectiveness of the project should be studied in detail.

48. Irrespective of the lack of institutional facilities, the Department has gone a long way with its staff development programme. Efforts have been made to identify and utilize possible programmes and facilities existing elsewhere in administering the Department's training programme. These efforts have resulted in a number of activities which have, no doubt, enhanced the skills of the Department staff with regards to customs administration.

49. As the national level, a series of ad-hoc basis courses for new entrants have been mounted in collaboration with the National University of Lesotho and the Lesotho instituts of Public Administration. In addition, a 2-weeks intermediate course for customs assistants was designed and mounted with the latest taking place 6 February through 2 March 1984. Subjects covered during the course are shown in table 6. Currently, six staff members are undergoing advanced studies at the National University of Lesotho.

Table 6. Subject Areas for the 2-weeks Training Course for Customs Assistance

1.	Structure of the Government	12.	Customs Tariff
2.	Public Service Order	13.	Valuation
3.	Structure of Customs Department	14.	Import Trade Statistics
4.	Customs Union Agreement	15.	Clearance Formalities (import & export)
5.	Customs Legislation	16.	Duties of Officers at Border Posts
6.	Code of Instruction	17.	Registry Procedures
7.	Official Communication	18.	Agency Work
8.	Budget	19.	Financial Regulations
9.	Excise Principles	20.	Air Freight Clearance
10.	Security	21.	Postal Clearances
11.	Transit Shede	22.	Customs Terminology

50. The Department has been involved in the BLS Regional Customs Training Programme under the auspices of the EEC in the following areas:

	1980	1981	Total
- Basic BLS regional training course in customs procedures	-	8	8
- Intermediate BLS regional training course in customs precedures	4	4	8
- Advanced BLS regional training courses in customs procedures	2	4	6
Total	6	16	22

It is indeed unfortunate that due to difficulties in recruiting a qualified trainer, the BLS Regional Training Programme has been inactive since 1982 despite the availability of training funds under the project. Indications exist that efforts to reactivate the programme are being made by the Department.

51. Finally, senior and middle-level officers are sent outside the BLS region to undergo advanced training in customs administration and management. Accordingly, staff have, since 1979, attended courses in Austria, Australia, Belgium, Canada, Denmark, England, Finland, Malawi, Malta, Republic of South Africa and West Germany. The number of staff who have participated in the training programmes by type of course over the last 3 years is shown in table 7.

Zambia

Administration and operation

52. The Department of Customs and Excise within the Ministry of Finance, administrators customs duties, excise and sales tax and enforces import licensing and exchange control. The Department is headed by a controller of customs who is assisted by 2 Deputy and 3 assistant controllers. Activities of the Department are concentrated at the following ports of entry and 35 stations with Lusaka, Lusaka Airport, Ndola and Kitwe being the most busiest.

1. Chingola
   - Chingola
   - Chavuma
   - Jimba Bridge
   - Kasumbalesa
   - Kipushi
   - Muliashi

2. Chipata
   - Chipata
   - Chanida
   - Lusmtha
   - Mwami

3. Chirundu
   - Chirmundu
   - Kiriba

4. Kabwe
   - Kabwe
   - New Kapiri Mposhi

5. Kafue

6. Kitwe

7. Livinsgstone
   - Livingstone
   - Katima Mulilo
   - Kazmzula
   - Victoria Falls

8. Lusaka

9. Lusaka Airport

10. Mbala
    - Mbala
    - Lumi River
    - Mpulung
    - Zombe

11. Nakonde
    - Nakonde
    - Muyanbe
    - Nyala

12. Ndola
    - Ndola
    - Chembe
    - Kashiba
    - Lukwesa
    - Mokambo
    - Sakania

Table 7. Number of Trainees by type of course by year, 1979-1983

Type of Course	1979	1980	1981	1982	1983	Total
Advanced course on principles and application of tariff classification	-	-	3	-	-	3
Investigation and customs techniques	1	-	-	-	-	1
Special Training Course for Senior Customs Officers of LDS	1	2	-	1	2	6
Familiarisation courses on practical application of customs procedures within common customs areas	3	6	6	6	6	27
Customs administration	1	-	-	3	2	6
Customs procedures for senior customs officials	-	1	-	1	1	3
Illicit traffic in narcotic drugs and psychotropic substences	-	-	-	1	-	1
Total	6	9	9	12	11	47

Source: Department of Customs and Excise Annual Reports, 1979-1983.

General customs clearance operation involve rail clearance in rail warehouses, road transport clearance at border post and entry ports and air transport clearance at Lusaka Airport. Procedural arrangements for rail and air transport clearance have improved over the years relative to those for road transport clearance.

Staffing situation and pattern

53. The staffing of the Department of Customs and Excise by job classification and the distribution of staff by ports of entry are shown in Table 8 and 9. Two respective observations emerged from the tables. One, the trend in the approved post for staff with managerial responsibilities has been rising gradually reaching a 100 per cent increase from 1966 to 1982. Equally worth noting is that the number of post approved for the other category of staff jumped from 258 in 1976 to 591 in 1982 as a result of the creation of over 200 posts for preventive assistance. This move is aimed at strengthening activities associated with border patrols, customs barriers and the examination of vehicles.

54. The other observation relates to the distribution of staff at operation posts. In the regard, two issues are worth noting. First, though the Livingston port has lost its importance is terms of activities, it is marred by nearly 18 per cent of the total 603 customs officials. Secondly, only 4 out of 12 officers with managerial responsibilities are posted outside of livingstone with Lusaka Airport and Ndola having

2 each. The implication is that the making of day-to-day managerial and administrative decisions is mostly entrusted to customs collectors grades 1 and 11. Associated with this is the problem of a high turn-over rate among staff particularly young university graduates who are usually recruited as customs officers. This situation often result from the combination of the existing limited career development opportunities, inadequate incentives and higher rewards outside of the Department of Customs and Excise. Emphasis was placed on the need to rectify the situation.

Training institution and programme

55. The Customs Central Training School (CCTS) located on the off sketch of Lusaka, began its foundation in early 1970. Presently, the school operates (i) a 3 weeks orientation in-service course over a 6 month period primarily for newly recruited customs officers; (ii) a basic 3 month intermediate course; and (iii) an advanced course for examination officers tailored to a particular need and time. Operations of the school have been extended to parastatal officials handling customs matters. Other activities have been carried out in collaboration with the University of Zambia and the National Institute for Public Administration.

Table 8. Trends in approved customs personnel in Zambia, 1968-1983

Job Classification and Category	1968		1971		1973		1976		1981 3/	1982 3/
	Establish-ment	Actual	Establish-ment	Actual	Establish-ment	Actual	Establish-ment	Actual	Establish-ment	Establish-ment
Managers										
Controller	1	1	1	1	1	1	1	1	1	1
Deputy Controller	1	1	2	2	2	2	2	-	2	2
Assistant Controller	4	4	2	1	2	2	2	3	3	3
Senior Collector	-	-	3	3	3	3	6	2	6	6
Sub-total	6	6	8	8	8	8	11	6	12	12
Administrators										
Collector Grade I	7	7	7	6	7	3	7	6	10	10
Collector Grade II	10	12	16	13	16	16	18	13	18	18
Senior Examining Officer	26	23	23	17	24	19	34	18	34	34
Examining Officer	81	58	60	45	66	51	81	36	81	81
Customs Officer	213	142	120	101	130	125	188	154	188	188
Customs Assistant	(ns)1/	(ns)1/	66	36	30	24	30	11	50	-
Sr. preventive Assistant2/	-	-	-	-	-	-	-	-	50	(ns)1/
Preventive assistant 2/	-	-	-	-	-	-	-	-	210	210
Sub-total	337	242	292	218	281	238	258	238	591	591
Grand total	343	248	300	226	289	246	269	244	603	603

1/ Not separately listed.

2/ Category created after 1976.

3/ Actual personnel employed in 1981 could only be known from head office in Livingstone. There was, however, speculation that a 10-12 per cent vacancy rate, existed in the letter category of personnel.

ble 2. Distribution of customs officers by categoriy and by ports and entry as at 1981 in Zambia

Job Classification and Category	PORTS OF ENTRY												
	Chinogala	Chinata	Chirundu	Kabwe	Kaful	Kitwe	Livnstone	Lusaka	L.Airpotrt	Mbala	Makonde	Ndola	Total
Controller	-	-	-	-	-	-	1	-	-	-	-	-	1
Deputy Controller	-	-	-	-	-	-	2	-	-	-	-	-	1
Assistant Controller	-	-	-	-	-	-	1	1	-	-	-	1	3
Senior Collector	-	-	-	-	-	-	4	1	-	-	-	1	6
Collector I	1	-	-	-	-	1	7	-	1	-	-	2	12
Collector II	1	1	-	1	1	-	7	2	1	1	1	2	18
Senior Examining Officer	1	1	2	1	1	3	11	5	2	-	1	5	34-
Examining Officer	4	4	3	4	4	6	16	10	10	2	2	14	81
Customs Officer	16	14	10	0	8	10	27	20	24	6	8	34	186
Senior Preventive Assitant	5	6	4	2	-	-	7	-	1	6	7	12	50
Preventive Assistant	30	23	14	7	2	6	24	8	6	20	20	50	210
Total	58	50	35	24	16	26	107	47	45	35	39	121	603

56. Major contents of the orientation and intermediate training programmes are presented in the following table. Classroom lectures are supplemented by field trips to industries.

Table 10. Contents of the orientation and intermediate training programmes for customs officials in Zambia

	Orientation Course		Intermediate Course
1.	Introduction to Customs and Excise	1.	Introduction to Customs Excise
2.	History of Customs and Excise in Zambia	2.	Legislation
3.	Ports of Entry and Routes	3.	Customs Duties
4.	Staffing and Terms of Reference of the Department of Customs and Excise	4.	Introduction to the Tariff Book
5.	Legislation	5.	Ancilliary Tariff
6.	Introduction to Customs and Excise Tarrif Book	6.	Principles of Taxation and 1st Requirements
7.	Customs Duties	7.	Theory, practice and methodology of Excise in Zambia
8.	Protection	8.	Imports and Exports controls - Commerce and Agriculture
9.	Introduction to Imports and Exports Controls	9.	Some Economic Considerations Relating to Customs and Excise
10.	Clearance of imports report general introduction	10.	Principles of Accounting
11.	Report Writing: Importation of goods by Rail	11.	Practical examination of sales contract, definition and appointment charges and discounts
12.	Job: Delivery office rail advice notes	12.	Industrial drawbacks and rebates
13.	Report writing: importation of goods by road	13.	Bonded warehouses management
14.	Job: Removals in bond forms and procedures	14.	Traffic control
15.	Report writing: importation by air, ship and parcel post	15.	Exchange controls
16.	Job: Bill of entry face check		
17.	Basic systems for clearing imports, postals and air-freight		
18.	Exchange control		
19.	Introduction to value for duty purposes		
20.	Cash reconciliation		

Facilities and trainers

57. CCIS has a boarding capacity to accomodate up to 20 residents at a time with 2 trainees per room. There are 2 classrooms with one being underutilised at the moment given that at any point in time, one classroom is more than adequate to accommodate trainees in residence. It is anticipated that the second room will become fully utilised when plans to double the dormitory capacity are realized. Additionally, the school operates under a tight financial situation which has resulted in the lack of adequate teaching aids and stationery.

58. On board are 3 qualified trainers who are usually assisted by other customs officials as and when the need arises. The team is composed of a chief training officer who is an acting senior collector and 2 senior training officers with the rank of collectorII. Both Senior training officers have undergone training as trainers outside Zambia. One trained for 5 months in 1975 and again for 4 months in 1980. The other trained for 5 months in 1979. Notwithstanding, there was the concern that the existing staff is not adequate sufficiently to mount and operate a training course for high-level customs administrators and managers. As such, a heavy reliance on the use of foreign training institutions exist. In any case, the school is presently understaffed by 1 full time trainer if the present programmes are to be effectively serviced. School officials stressed the urgent need to create an establishment post for and recruit a well qualified and experienced trainer.

Output

59. Performance at the shcool is an indicator for possible promotion to the next grade. Though trainees are aware of this, many of them do not perform well due teasons ranging from background to attitude in training. In many cases, additional chances are given to poor performance during subsequent programmes.

60. A major concern about the output of the school is the divergence which exists between the performance level of a number of trainees during training and their actual performance on the job after training. This gap has resulted in what was described as a "fair performance" rating on the part of most graduates from the school. It was remarked that trainees "seen to forget when they leave the school though they seen to have been enthusiastic when they are in".

61. Graduates from the school are complemented by graduates from other training schools abroad. A training plan involving at least 24 trainees to undergo advanced training in Customs Administration for the period 1985-1988 in the U.K., New Zealand, Australia, Austria, Finland and U.S.A., has been proposed to Government for approval and action.

C. Conclusion

62. Progress has been made towards the establishment and development of institutional arrangements for customs administration and management in Botswana, Lesotho and Zambia. Training programmes have been mounted but the inability to retain trained personnel has hindered the work of the various customs dept. studied. Poor career prospects and pay package in relation to what pertains in private and parastatal interprises have intensified the problem.

63. Despite this, the respective Departments will have to be strengthened in terms of staffing and facilities if the three member States are to be actively involved with the activities of the PTA and other inter-governmental organizations dealing with economic co-operation. In this regard, all efforts should be made to implement the PTA Treaty's call for regional co-operation in training and harmonization of training programmes. A starting point would be the development of a plan of action specifying the types, content and duration of national and regional training programmes to be based upon the findings of the skills profiles and training needs study. Secondly, measures should be found to ensure, among other things, that officials with appropriate qualifications are recruited and retained. Consequently, the skills profile and training needs study should be completed as soon as possible and necessary adjustments made with regards to the terms of employment for customs officials.

SUMMARY OF FINDINGS FROM FIRST MISSION TO ZIMBABWE, KENYA AND UGANDA ON CUSTOMS ADMINISTRATION SKILLS PROFINE AND TRAINING NEEDS

Zimbabwe: Establishment (Customs Cadet upwards)

3. In 1983 the establishment in the Department of Customs and Excise consisted of 1 controller, 3 Deputy Controllers, 11 Assistant Controllers, 18 Collectors Grade I, 30 Collectors Grade II, and 259 Examining Staff. The examining staff includes Customs Cadets, Customs Officers, Customs Prefects, Senior Examining Officers and Examining Officers. The recruitment for these cadres is normally done direct from school, the minimum qualification being 5 good "O" level passes in acceptable subjects, coupled with success at a written aptitude test and at a subsequent interview.

Training

4. The usual pattern is :-

Phase I : The Cadet attends a 4 week induction and aptitude assessment course shortly after his appointment, which at this stage is probationary. This training course is designed to provide a Cadet with basic theory and with practical training, so that he is capable of actually doing the work expected of him during his first 12 months in the Department.

Phase II : After he (or she) has served as a Cadet for 12 months, he will attend the Training School once more for a 3 week concentrated course dealing with a wide range of activities at a more advanced level than phase I. Success on this course coupled with a satisfactory report from his (or her) head of office would lead to advancement to Customs Officer grade.

Phase III : After he (or she) has served as a Customs Officer for 2 years, the officer returns to the Training School for a 6 weeks course, which consolidates the matter learnt at thePhase II course and introduce none advanced material, involving principally the examining of documentation relating to the importation of goods. Success at a written examination held at the end of this course, plus satisfactory performance before a Department Suitability Board, plus a satisfactory report from the Officer's head of office will lead to advancement to Examining Officer grade.

Training School:

5. This is run by a Collector Grade I, who is assisted by a Collector Grade II and 8 Examining Staff. The premises are cramped and far from ideal. Plans have been drawn up for a new building, which will represent a great improvement as compared with the current one. It is hoped that this will be ready in 1984.

Special Training

6. It will be noted that the Department (in accordance with recommendations of the Customs Co-operation Council) undertakes its own basic training. Thereafter Zimbabwe has started looking for offers made by the C.C.C. for advanced training on

specialised subjects, and officials have attended or are currently attending courses in Austria, Australia, Denmark, Great Britain, Malawi and West Germany. This is a new departure for this Department and its benefits although expected to be considerable, have yet to be evaluated.

Future Training on Regional basis

7. There is much scope for this (the Malawi course mentioned above is a case in point) and this could possibly be arranged by the P.T.A. in co-operation with the C.C.C. This training would, ideally, be of the specialist advanced type, as and until all member States of the P.T.A. have harmonized their procedures and tariffs, it is thought that training at the lower levels should be continued on a national basis.

Kenya

8. A preliminary survey of the customs and excise department revealed the following occupational structure:-

MOMBASA	- Commissioner
NAIROBI	- Deputy Commissioner - Assistant Commissioner (Revenue)
MOMBASA	- Assistant Commissioner (Administration) - Chief Investigation Officer - Chief Collector (Inspectorate)
NAIROBI	- Chief Collector (Valuation and Excise) - Chief Collector (Revenue) - Principal Collector (Customs Co-operation Council)
MOMBASA	- Principal Collector (Training) - Senior Statistical Officer (Training) - Preventive Officer I (Training) - Accounts Controller - Chief Accountant

STATISTICAL BRANCH

NAIROBI	- Chief Statistical Officer Principal Statistical Officer
MOMBASA	- Senior Statistical Officer
NAIROBI	- Senior Statistical Officer Data Processing Director

SOUTHERN REGION

MOMBASA	- Assistant Commissioner - Chief Collector - Principal Collector - Principal Investigation Officer - Preventive Officer I

NORTHERN REGION

NAIROBI	- Ag. Assistant Commissioner - Ag. Chief Collector - Ag. Principal Collector - Principal Collector (Refunds and Local Industries)
EMBAKASI	- Ag. Principal Collector (Jomo Kenyatta International Airport)
KISUMU	- Principal Collector (Western Kenya)
NAIROBI	- Ag. Principal Investigation Officer
EMBAKASI	- 3 Preventive Officers I
KISUMU	- Preventive Officer I.

9. The various cadres of manpower in the customs and excise department are recruited at graduate "A" and "O" level education standards. There is a residential training school in Mombasa which can cater for 65 trainees at any one given time. The duration of training varies between 2 - 3 months and two years depending on the educational level at which the trainees are recruited. However there are plans to expand the school with the assistance from EEC.

UGANDA

10. At the time of the survey, Uganda was in the process of finalising its comprehensive manpower survey. The results of the survey should assist in making a more realistic comparative analysis with the other countries in the subregion.

11. The Committee of Officials may wish to recommend to the Council of Ministers that during 1984-85 an inventory of customs personnel operating in this subregion be completed and that an assessment of upgrading requirements for the existing customs personnel and any additional personnel requirements in customs administration be expedited. Only then will it be possible to develop training programmes, workshops and seminars for customs personnel with a curriculum tailored to the ideals of PTA. Training and retraining should be well underway in 1985-1986.